

Judge

log 2

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

JOHN RICHARD JAE,  
Plaintiff,

vs.

C. A. LESTER,  
Defendant.

FILED  
HARRISBURG

AUG 27, 2001

MARY E. D'ANDREA, CLERK  
Per [Signature]  
DEPUTY CLERK

Civil Action No. 1:01-CV-01-0

U.S. District Judge Rambo  
Magistrate Judge Smyser

MOTION FOR ENLARGEMENT OF TIME

Comes now, the Plaintiff John Richard Jae as Counsel in the above-entitled Civil Action John Richard Jae, as a Layman Unlettered in the Arts & Sciences of the Law, Legal Procedures within the United States and now files his Motion for Enlargement of Time pursuant to Fed. R. Civ. P. 6(b) & who avers, deposes & states:

1. On June 22, 2001, the Plaintiff John Richard Jae, filed his Petition for Writ of Mandamus And Brief In Support, herein this case.

2. Such Petition is still pending before this Court at this time.

3. Due to the fact that Plaintiff does not have his Case File/Paper Legal Materials and Law Books and also does not have enough Paper nor Case Paper to prepare his Brief In Opposition to Defendant's Motion to Revoke Plaintiff's In Forma Pauperis Status And to Stay of Proceedings and no large legal envelopes mailed such to this Court and to Counsel for the Defendant, as stated in his Petition for Writ of Mandamus, herein, and, given that he needs the Court to order officials here to provide such to him first, and given the fact that the Court has not yet ruled on such Petition for Writ of Mandamus, he this Plaintiff is unable to prepare, file or serve his Brief In Opposition to Defendant's Motion to Revoke Plaintiff's In Forma Pauperis Status And Stay of Proceedings, herein this case, by the present due date for such of August 22, 2001, and therefore, he requests an enlargement of time of thirty days from this date to & including September 24, 2001, in which to file & serve his Brief In Opposition to Defendant's Motion to Revoke Plaintiff's In Forma Pauperis Status And Stay of Proceedings, herein this case.

(W) HEREOF, Plaintiff John Richard Jae, prays that this Court will grant an Enlargement of Time of 30 days until September 24, 2001, in which to prepare his Brief In Opposition to Defendant's Motion to Revoke Plaintiff's In Forma Pauperis Status And Stay of Proceedings, herein this case:

RESPECTFULLY SUBMITTED

(s) John Richard Jae  
JOHN RICHARD JAE

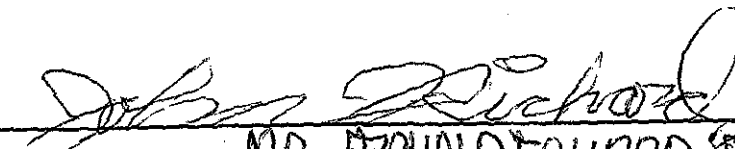
CERTIFICATE OF SERVICE  
JAE VS. LESTER,  
CIVIL NO. 01-0041

I certify that on 8/23/01, I mailed to the person / to  
below, a true and correct carbon copy of each of Plaintiff's  
Motion for Enlargement of Time and Plaintiff's Brief in Opp  
to Defendant's Motion for Stay of Proceedings And Enlargement  
of Time to Respond to Plaintiff's Petition for writ of Mandamus,  
U.S. 1st Class Mail, Postage Prepaid, and addressed to

Ms. Victoria S. Fagmoth,  
Assistant Counsel  
Pennsylvania Department of Corrections,  
Office of the Chief Counsel  
550 Hey Drive  
Camp Hill, PA. 17011

I certify that on 8/23/01, I gave the originals of the  
above-same documents to Prison Officials here for delivery  
to this Court.

I certify under penalty of perjury & pursuant to: 28 U.S.C.  
that the above, is true & correct.

(S)   
MR. JOHN RICHARD S.

Dated/Executed on:  
23rd AUGUST 2001:  
At: Waynesburg, Pennsylvania:

#BA-3219  
Sgt. Greene/SMV  
175 Progress Drive  
Waynesburg, PA-153  
Plaintiff and Res C